

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

**In re: Sharon R. Baird, ) Case No: 17-16587**  
**Debtor ) Chapter 13**

**EXPEDITED MOTION TO RECONSIDER NOVEMBER 30, 2017 ORDER**

**COMES NOW**, Debtor, Sharon Baird, by and through her undersigned legal counsel, Peter Blust, Esquire, and respectfully represents to this Honorable Court, the following:

1. On November 30, 2017, this Court **GRANTED** an **ORDER** granting, *inter alia*, Movant, 1600 Church Road Condominium Association Relief from Automatic Stay.
2. For numerous reasons, said reasons largely resulting from undersigned counsel's Office computer having been 'UPDATED' by Microsoft over the course of multiple days in November, 2017 (rendering said computer unusable in many applications for which it had been used without problems since January 27, 2016), in compliment with undersigned counsel's mis-perception/mis-interpretation of this Honorable Court's Local Rules relating to filing 'deadlines', undersigned counsel failed to appear before the Court November 30, while similarly failing to file a response to Movant's November 13, 2017 Motion for Relief from Automatic Stay.

3. Respondent/Debtor begs the Court to forthwith suspend its

November 30, 2017 ORDER granting Movant 1600 Church Road Condominium Association Relief From Automatic Stay for, *inter alia*, the following reasons: (A) Respondent/Debtor has obtained full employment commencing this date – 12-4-2017 (net wages in the \$800/month range); (B) Respondent/Debtor's co-habitant obtained a full-time job September 18, 2017 and has amassed a fund sufficient to fund monthly payments to the Trustee in the \$952 to \$1,150 per month range.

4. Debtor/Respondent, and her co-habitant of the last 6-8years, have expressed to undersigned counsel their collective commitment to faithfully and timely make the payments ultimately approved by this Court in a Chapter 13 Plan not yet firmed – the 341 Hearing having not yet occurred (*inter alia*).

WHEREFORE, for the foregoing reasons, Debtor, and undersigned counsel, hereby respectfully request this Honorable Court suspend its current November 30, 2017 **ORDER** permitting, *inter alia*, a Sheriff's Sale, currently set for Wednesday, December 6, 2017, to proceed.

BY: DEBTOR'S LEGAL COUNSEL,

/s/ Peter Blust, Esq. 12/4/2017  
Signature of Attorney Date

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		)	
	<b>Debtor</b>	)	<b>Chapter 13</b>

**ORDER**

**IT IS HEREBY ORDERED** that this Court's **ORDER** dated November 30, 2017, for reasons outlined by Debtor's counsel in filing dated December 4, 2017, should be, and hereby is, **TEMPORARILY SUSPENDED**.

BY THE COURT

Date: \_\_\_\_\_

\_\_\_\_\_  
United States Bankruptcy Judge